

November 12, 2019

**Filed Electronically via ECF**

Honorable Ona T. Wang  
U.S. Magistrate Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 920  
New York, NY 10007

**Memo Endorsed**

**Application Granted.**

**SO ORDERED.**



Ona T. Wang 11/17/2019  
U.S. Magistrate Judge

**Re: Joseph Perrone v. Commissioner of Social Security**  
**Civil Action Number: 1:19-cv-05171-LTS-OTW**

Dear U.S. Magistrate Judge Wang,

The undersigned writes on behalf of Plaintiff, with the consent of Defendant's counsel, to respectfully request an extension of time to file Plaintiff's Motion for Judgment on the Pleadings and supporting Memorandum of Law in the above matter, and to respectfully request approval of the proposed amended briefing schedule.

Plaintiff's motion and brief are currently due Monday, November 18, 2019. The undersigned requests a twenty-eight (28) day extension of time to file Plaintiff's motion and brief, or up to and including Monday, December 16, 2019. This is Plaintiff's first request for an extension and opposing counsel consents to this request. Plaintiff's counsel seeks this extension due to multiple, simultaneous filing deadlines, coupled with the large administrative record (at nearly 1,500 pages) which prevents thorough and proper preparation of the brief by the current deadline.

In accordance with the Court's Scheduling Order in this matter (Dkt. No. 5), Plaintiff proposes the following briefing schedule:

1. Plaintiff's motion for judgment on the pleadings and supporting memorandum due December 16, 2019.
2. The Commissioner's responsive pleading and any cross-motion due February 14, 2020.
3. Plaintiff's reply (if any) due March 6, 2020.

Thank you for your consideration.

Respectfully,

/s/ Howard D. Olinsky  
Howard D. Olinsky, Esq.